## INITIAL CONFERENCE QUESTIONNAIRE

| 1.    | Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page):  | 10/31/11                            |
|-------|--|-------------------------------------|
| 2.    | Deadline for first request for production of documents and first request for interrogatories:  | 11/14/11                            |
| 2(a). | Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for:  | plaintiff(s) $0$ ; defendant(s) $0$ |
| 3.    | Date for completion of any joinder of additional parties and amendment of the pleadings:   | 12/6/11                             |
| 3(a). | Number of proposed additional parties to be joined, if any, by:  | plaintiff(s) $3$ ; defendant(s) $1$ |
| 4.    | Number of depositions by plaintiff(s) of:  | parties 4 ; non-parties 2           |
| 5.    | Number of depositions by defendant(s) of:  | parties 1 ; non-parties 2           |
| 6.    | Date of <u>status conference</u> (joint status report due two business days in advance):   |                                     |
| 7.    | Date for completion of factual discovery:  | 3/30/11                             |
| 8.    | Are expert witnesses needed?   | Yes No _X                           |
| 8(a). | Number of expert witnesses, if any, of plaintiff(s):   | medical 0 ; non-medical 0           |
| 8(b). | Date for completion of those expert reports:   | N/A                                 |
| 8(c). | Number of expert witnesses, if any, of defendant(s):   | medical 0 ; non-medical 0           |
| 8(d). | Date for completion of those expert reports:   | N/A                                 |
| 9.    | Date for completion of expert discovery:   | N/A                                 |
| 10.   | Date of <u>pretrial conference</u> (brief <i>ex parte</i> statements of settlement position due via fax two business days in advance): |                                     |
|       |  |                                     |

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| 11. | Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions:  | N/A              |  |
|-----|---|------------------|--|
|     | plantiff(s) and tales for fining of those motions.  | N/A              |  |
| 12. | Types of contemplated dispositive motions by defendant(s) <u>and</u> dates for filing of those motions:   | Summary Judgment |  |
| 13. | Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.)   | Yes X No         |  |
| 14. | Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.)                           | Yes No _X        |  |
| 15. | Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do <u>not</u> indicate which party declined.) | Yes No X_        |  |